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Approved For Referse 2005/04/18: CIA-RDP82M00591R000100010057-9

DIRECTOR OF CENTRAL INTELLIGENCE Security Committee

SECOM-D-527

2 8 MAY 1979

	MEMORANDUM FOR: Director of Security	
TAT	FROM: Chief, Community Security Group	
STAT	SUBJECT:	
	1. The APEX proposal has been formulated and has sent a report to the DCI. Although he has not released	АТ
STAT	any other copies yet will do so as soon as the DCI gives release authority. Working Group Members and ST NFIB Principals will get copies with a request to address it at an early NFIB meeting.	ΑТ
	2. The APEX proposal will impact directly on both the Office of Security and SECOM and will have considerable impact on other elements in the Community as well as on the way business is done in the Compartmentation world.	٠
	3. It seems appropriate that we send a paper to the DCI on APEX. (From close association over the past four months, we have heard most of the concerns.) Attached for your consideration is a paper that reflects most of the security and administrative areas of concern with the APEX proposal.	
	4. Before releasing the paper, I propose we discuss it because some of the points are really non-issues, some are reflection of weak concerns, some provincial areas and some are valid points of contention. I propose this least you attend and support some well intended but unreal concerns.	
	ST	АТ
	Attachment	

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SUBJECT: APEX

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C/CSG fh (5/22/79)

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MEMORANDUM FOR: Director of Central Intelligence

THROUGH: Deputy Director for Administration

FROM: Robert W. Gambino Director of Security

SUBJECT: APEX

1. This memorandum is for your information. It contains my views and comments on the proposed APEX Special Access Program as I see them from the position as your Director of Security for the Agency and as the Chairman of your Security Committee.

2. I believe that your decision to review and realign the Community's myriad compartmentation programs was both timely and well taken.

early review and collection of data focused attention on the multiplicity of compartments and provided opportunity to confirm to most of us your original concept that the systems needed realignment.

did an outstanding job in translating the perception into the concrete. The Community member's responses call for detailed reexamination of the current ways of doing business were not forthcoming without his continued encouragement.

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3. The current version of the APEX proposal represents the best possible "fix" and undoubtedly will not satisfy those who hoped for extreme liberalization of controls and will not satisfy those who looked for tighter security restrictions. The balance between the antagonistic goals of easier dissemination procedures and better, tighter security over our sensitive

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intelligence will not come to a complete rest with a decision to adopt or not adopt the APEX proposal. There will be considerable need to carefully implement the wide range of changes in our way of doing business before the new ways function smoothly. I have no doubt that both the consumer and the security elements will petition you for relief for perceived misalignments.

- 4. As your security adviser, I feel I should bring some general observations to your attention.
 - a. First, the elimination of separate and distinct compartmentation systems in favor of the adoption of a single uniform procedure represents a reduction in security. Security controls are enhanced by utilization of distinct procedures for different aspects of the intelligence process and even by use of different procedures within given segments of the collection process.
 - b. Second, elimination of compartmentation programs such as the system sacrifices the value of these systems to serve the unique demands for which they were created. It certainly sacrifices the mystique that has been fostered and which has become tangibly entwined with some of the security control procedures.
 - c. Third, there will be confusion and errors resulting from imposition of one system of common standards and procedures which replaces existing compartmentation systems. The security risks inherent in the change over a period should be acknowledged and evaluated in determining the price of adopting an APEX proposal.
 - d. Fourth, there is repeated expression of concern from personnel that the proposed APEX system would deny us the security latitude needed, and so successfully employed, in previous undertakings such as the building and operation of the U-2 and the Glomar Explorer. Perhaps we shall not again undertake such large scale security efforts but the option for tomorrow should not be closed today.

- e. Fifth, the APEX proposal has not been accompanied by parallel recognition that the release of considerable volumes of formerly compartmented information at standard levels of classification will increase the potential for serious unauthorized disclosures. To my way of security thought this is like reducing the volume of compartmented material simply because that mode is seen as too full. It does reduce the volume in the container but there should be better attention paid to what has been withdrawn.
- 5. I offer the following specific concerns.
- First, the establishment of a separate and distinct APEX Control Organization has direct impact on the Office of Security with the proposal to take positions from our current T.O. As you know from my repeated petitions for allocations of more positions to meet at a minimal level the increased demands, the Office of Security can ill afford to lose slots. While it is true that _____ of the ______slots are located in the Compartmented Information Branch and serve the Community in registration and certification of access approvals, it should not be overlooked that a significant role of this element is the maintenance of CIA's and, through the CIA, the non-NFIB agencies' special access approvals. Removal of this element will force additional tasks on the remnants of the Office of Security at a time when we have been asked to cut back in strength in other areas. There is no relief apparent in our personnel ceiling for 1981 and loss of the CIB slots will, in effect, be an act of double jeopardy.

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possible source of slots for the APEX organization have been identified as with the recently structured Community Security Group. This is the element you approved to serve as the staff arm of the Security Committee and for which I took positions from the Office of Security. The CSG has allowed me to carry though on your desires to forge the Security Committee into a focal point through which you can address the Community on all security matters. It also performs as my staff in discharging some of those tasks you have levied on me that do not properly qualify as Community matters but extend beyond the domain

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of the Office of Security. With the pressures now existing on the Office of Security I have not been able to staff the CSG as originally proposed but I have made positions available on a reimbursable basis for a senior officer from the FBI and one from the Air Force. I see an increasing demand on this small group as we move more and more toward your goal of an integrated intelligence community. They accomplish current tasking through flexibility and knowledge of multidisciplines which allows concentration of resources. Reducing the size of this office by one third will have an effect by people.

- c. Third, the Security Committee itself is structured such that it incorporates a standing subcommittee on compartmentation. Chaired by the Air Force, members represent those elements of the NFIB association intimately involved with all facets of compartmentation, including the wide spread SIGINT organization. Experts in this area, it has been through their dedication and knowledge that the current compartmentation programs function as well as they do. The APEX Control Organization would remove from the purview of the Security Committee the requirement for attention to compartmentation and essentially lose the cohesion of this group and dissipate its day to day control or else require formation of a like element under the APEX Organization.
- d. Fourth, the thrust you have already provided in structuring a single channel for all Community security matters would be seriously denigrated by creation of an APEX Organization separate and apart from the Security Committee. According to present proposals, the APEX Organization would have considerable policy making authority under your delegation in matters concerning and directly related to security in a wide range of issues. The APEX Organization could be expected to address security policy in documents and information control, physical security requirements, and personnel security requirements. The effect of this policy would extend throughout the entire Community and to those non-NFIB recipients of compartmented intelligence product. Such a division of security policy authority would result in creating a double source of potentially conflicting security advice to you, a double channel throughout the entire Community and non-NFIB recipients of intelligence products for transmission of security directives and a

double channel for surfacing security issues. I do not believe that such a move is inherently compatible with your expressed desire and actions toward clean lines of authority and responsibility.

- e. Fifth, the APEX proposal includes the use of a badge on which would be indicated the identity and accesses for which the bearer is approved. It is considered by some as an extension of current practices within CIA (the use of the H to indicate SI and TK approvals) and other agencies. From the standpoint of security I cannot endorse use of a badge that would serve all elements of the government and possibly all facets of industry as a means to verify that the bearer is authorized access to part or all of our sensitive intelligence. It would be next to impossible to keep such symbols current. An outdated badge would be dangerous, a lost badge could be catastrophic.
- Sixth, the APEX proposal that Senior Intelligence Officers (SIOs) have the authority to provide access for personnel within their cognizance without additional control is viewed as undesirable from both the security viewpoint and from the view of system management and control. I believe you would soon see an undesirable spread of knowledge and a rapid increase in numbers of cleared personnel. You are well aware of the large numbers of requests for relief from your injunctions against increased clearances. All of these requests are STAT standing by waiting to be implemented under SIO authority of the APEX proposal. The people currently approved for access to one or more of today's compartments could well double in number within a year. While I dislike billet systems, I believe a billet structure to be a more desirable route to follow and suggest careful reflection on the likely loss of control over numbers of accesses if you endorse the APEX proposal that SIOs can be the sole arbitrator of who is approved for access to our intelligence operations and products.
- g. Seventh, the efforts to cost out the implementation of the APEX proposal surfaced a situation that indicates that our communication intelligence distribution system is exceptionally rigid, immutable and from the security viewpoint most fragile. There were reviews of the SI distribution and processing systems by ADP experts and

communicators. Their reports included statements to the effect that some of the manufacturers of hardware now in use are no longer in business. The software concepts are lost to history and the only means of modifying our current procedures would be unacceptably expensive and accomplished through a contractual arrangement and use of a trial and error procedure. If we learned that

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recommendations at this time but I believe that further attention at the NFIB level is warranted.

Eighth, incorporated in the APEX proposal is the concept that a considerable volume of formerly compartmented intelligence product will become available under standard levels of classification. We have found significant weakness in security clearance procedures, primarily associated with unsatisfactory background investigations in the uniformed services. I had hoped to be able to initiate improvement. Unfortunately budgetary constraints, reduced financial and personnel resources pose a formidable Inquiry into alternative means of obtaining satisfactory levels of assurances of loyalty and suitability, such as the polygraph, surfaces continued opposition to use of such procedures. I believe, however, that the CIA and NSA have compiled impressive evidence of the value of such alternative or supplemental investigative techniques and would suggest your favorable consideration and support in encouraging the Community members to reevaluate their position against the polygraph. In connection with the APEX proposal, I certainly endorse the use of the polygraph as a condition of access to APEX Operational data and for I am constrained in suggesting that recipients of APEX controlled intelligence products in the generic COMINT, Technical and HUMINT compartments also be required to take the polygraph solely out of recognition of the large numbers of such recipients and the few polygraph resources in the Community.

6. In summary I believe that:

- the review of our compartmentation program is timely and appropriate and surfaced some weakness in our current SIGINT communication and processing procedures.

- the proposal to establish a single system of compartmentation sacrifices security values and flexibilities inherent in separate and distinct special access programs.
- the release of considerable volumes of formerly compartmented intelligence under standard levels of classification should be accompanied by upgraded requirements for access to noncompartmented intelligence.
- the creation of an APEX control organization outside of the purview of the Security Committee will result in possibly conflicting sources of security advice to you and competing sources of policy recommendations and implementation procedures to the Community.

Robert W. Gambino

Distribution:

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